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April 25, 2002

DEPT. OF TRANSPORTATION

Docket Management System
U.S. Department of Transportation
Room Plaza 410
400 Seventh St., SW
Washington, DC 20590-0001

02 MAY -7 AM 11:44

FAA-01-11133-2073

Re: Certification of Aircraft and Airmen for the Operation of Light-Sport Aircraft; Proposed Rule

Docket No. FAA-2001-11133; Notice no. 02-03

Dear Sir:

Being a pilot for the last 30 years, it is with pleasure that I have an opportunity to respond to your notice of proposed rulemaking (NPRM). I commend the FAA in your attempt to sort through the numerous issues that, I am now sure, were foreign to you in your decision making process.

First and foremost I do support the proposal. I do though question as to why some simple amendments could not of been to existing regulations, without reinventing the wheel. At count I came up with eight proposals that make just plane good sense. They are:

1. The training concepts that you refer to as the "building block approach."
2. Your adoption of a certification standard for us who want to manufacture.
3. The ability of the ultralight owner to certify their aircraft into the experimental category without complying with the 51% rule.
4. To be able to use our aircraft for commercial instruction. (BUT PLEASE REMOVE THE 3-YEAR LIMITATION.)
5. The reduced limitations that you propose to place on Sport pilot instructors as opposed to CFI's.
6. The maintenance proposal is close to perfect. (WHY THOUGH IS THERE SO MUCH RESTRICTION AS TO FLYING SPECIFIC MODELS?)
7. The new categories of aircraft that are proposed.
8. The self-certification on the medical requirements.

Notwithstanding, there are also some areas where you guy's just plane missed it.

1. The complexity of variable pitched props. Huh! It is a switch you flip in one direction to take off and land, and the other to cruise. These things are so un-complex it is amazing. I've owned Bonanza's, these don't even come close to those in complexity.

2. If retractable gear is not too complex for an amphibious aircraft, (where a gear down is probably more devastating than the common gear up in a non-amphibious,) why are they too complex for everyone else? Is there really a difference between repositional and retractable?
3. Your altitude restrictions just don't make good sense. When I fly in mountainous areas, I want as much separation as I can get. We fly aircraft that don't always have the power we would like to pull ourselves out of a mountain rotor. At least raise it to the "oxygen needed" standards as set forth for standard category pilots.
4. No helicopters? Ultralight helicopters have been around for decades, and they weren't too complex for the owners to build them. This non-inclusion would reduce industry advancements for these machines.
5. The 500-ft. agl minimum is also too restrictive. In my last 100 flights in my powered parachute, I can count on one hand the times that I went over 500-ft. I can see the need for restrictions in urban areas, but not out in the country.
6. The proposal as to having to be signed off on each make and model is way too restrictive. I own a 6 Chuter Spirit. I am thinking of buying a Condor. The difference between the two really comes down to age and hours, despite the fact that they are made by different manufactures.
7. Please grandfather in the models currently in use. They are serving a real purpose in training students. If they can continue for 3 years, why not 30?
8. The age restrictions, especially for powered parachutes should be the same as those for a glider rating. Powered parachutes are, guaranteed, as they won't stall, safer than gliders, which can stall.

Thank you for the opportunity to respond to this proposal and for your efforts in bettering a segment of aviation that is all too often misunderstood.

Respectfully,



Rob Jenks